

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Seminole combined cycle facility, by Seminole Electric Cooperative, Inc.

DOCKET NO. 20170266-EC

In re: Joint Petition to determine need for the Shady Hills combined cycle facility, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.

DOCKET NO. 20170267-EC

DATED: March 1, 2018

**SEMINOLE ELECTRIC COOPERATIVE'S
FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Seminole Electric Cooperative, Inc. ("Seminole") pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this Fourth Request for Confidential Classification of certain information provided in its responses to Staff's Second Set of Interrogatories (Nos. 35-41).

1. On February 23, 2018, SECI responded to Staff's Second Set of Interrogatories. Certain confidential information in those Responses was submitted with a Notice of Intent to Request Confidential Classification pursuant to Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are included with this request:

(a) Exhibit A is a package containing redacted versions of the documents for which Seminole requests confidential classification. The specific information for which confidential treatment is requested has been blocked out by

COM _____
AFD _____ opaque marker or other means.

APA _____

ECO _____

ENG redacted CD

GCL _____

IDM _____

CLK _____

COMMISSION
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(b) Exhibit B is a package containing un-redacted copies of the documents for which Seminole seeks confidential treatment. Exhibit B is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." In the un-redacted version, the information asserted to be confidential is highlighted in yellow.

2. The Responses to Interrogatory No. 35 and 36 contain design and engineering specifications for generating technology to be used in the Seminole Combined Cycle Facility (SCCF) and the Shady Hills Combined Cycle Facility (SHCCF). The disclosure of this information would impair the efforts of Seminole to contract for goods or services on favorable terms. *See* Section 366.093(3)(d), F.S. Without assurances that proprietary design and engineering specifications will not be publicly disclosed, future counterparties might choose not to respond to RFPs for generating technology or generating capacity that Seminole may issue in the future, and Seminole's efforts to contract for goods and services on favorable terms would be impaired by disclosure of the information deemed confidential by suppliers. Accordingly, the information identified in Attachment A qualifies for confidential classification under Section 366.093(3)(d), Florida Statutes. Likewise, the information relates to competitive business interests, the disclosure of which would impair the competitive business of General Electric, who designed the technology to be utilized in both the SCCF and SHCCF. As such, the information also qualifies for confidential classification under Section 366.093(3)(e), Florida Statutes.

3. Attachment 1 to this Request is a matrix identifying specific information within these responses and documents which are considered confidential, along with the specific statutory justification for seeking confidential classification.

4. The information for which Seminole seeks confidential treatment is intended to be and is treated as confidential by Seminole. The information has not been disclosed to the public.

5. Seminole requests that the information identified above be classified as "proprietary confidential business information" within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, Seminole Electric Cooperative, Inc. respectfully requests that this Fourth Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 1st day of March, 2018.

HOPPING GREEN & SAMS, P.A.

By: /s/ Malcolm N. Means

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request for Confidential
Classification was served upon the following by hand delivery on this 1st day of March,
2018:

Lee Eng Tan, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

/s/ Malcolm N. Means
Attorney

ATTACHMENT 1

JUSTIFICATION FOR CONFIDENTIAL CLASSIFICATION

Document	Page(s) or Tab	Column	Lines	Description	Statutory Justification
SECI Response to Interrogatory No. 35a	All	Capacity (MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat
		AHR (MBTU/MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat
SECI Response to Interrogatory No. 36a	All	Capacity (MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat.
		AHR (MBTU/MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat.
SECI Response to Interrogatory No. 36b	All	Capacity (MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat.
		AHR (MBTU/MW)	1-2	Contractual Term/Proprietary Engineering Data	§366.093(3)(d)-(e), Fla. Stat.